

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re:

BRAC GROUP, INC. (f/k/a Budget Group, Inc.),  
  
Reorganized Debtor.

MICHAEL BELGRAVE,

Appellant,

v.

THE PLAN ADMINISTRATOR FOR BRAC  
GROUP, INC.,

Appellee.

Chapter 11

Case No. 02-12152 (RB)

RE: D.I. 5315, 5325, 5332, 5480

Civil Action No. 05-319

**APPENDIX TO  
THE PLAN ADMINISTRATOR'S MOTION TO DISMISS MICHAEL BELGRAVE'S  
APPEAL AND MOTION TO STAY MEDIATION PENDING DECISION ON THE PLAN  
ADMINISTRATOR'S MOTION TO DISMISS APPEAL**

ASHBY & GEDDES  
William P. Bowden (I.D. #2553)  
Gregory A. Taylor (I.D. #4008)  
222 Delaware Avenue  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888

*-and-*

BROWN RUDNICK BERLACK  
ISRAELS LLP  
Peter J. Antoszyk  
Daniel J. Saval  
One Financial Center  
Boston, MA 02111  
(617) 856-8200

*Counsel to the Plan Administrator*

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (CGC)

Related Docket No. 5264

**ORDER APPROVING EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

Upon consideration of the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 (the "Objection");<sup>2</sup> by which the Plan Administrator requested the entry of an order disallowing in full and expunging each of the claims listed on Exhibits A and B attached to the Objection; and after hearing and consideration of the Objection and arguments contained therein, and the opposition thereto, if any; and the Court finding that (a) the Court has jurisdiction over this matter pursuant to Article XI of the Plan, 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and (c) notice of the Objection was due and proper under the circumstances; and good and sufficient cause appearing therefor, it is hereby

ORDERED, that the Objection is sustained as provided herein; and it is further

ORDERED, that the No Documentation Claims identified as "No Documentation Claims to be Disallowed and Expunged" on Exhibit A attached hereto are disallowed in full and

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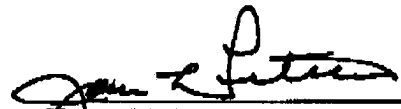
<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.'s United States debtor subsidiaries.

expunged in their entirety; and it is further

ORDERED, that Late Filed Claims identified as "Late Filed Claims to be Disallowed and Expunged" on Exhibit B attached hereto are disallowed in full and expunged in their entirety; and it is further

ORDERED, that this Court shall retain jurisdiction with respect to any matters related to or arising from the implementation or interpretation of this Order.

Dated: December 6, 2004  
Wilmington, Delaware

  
Honorable John L. Peterson  
United States Bankruptcy Judge

#1308890 v11

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Objection.

**Late Filed Claims to be Disallowed and Expunged  
Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

BRAC Group, Inc. f/k/a Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Basis for Objection
6108825 COMANS, JAMES C/O WALTZER & ASSOCIATES BRUCE C. WALTZER 3715 WESTBANK EXP. SUITE 13 HARVEY, LA 70058	00005233	02-12152	05/20/2004	\$10,000.00	U	The proof of claim was filed after the Bar Date.
6112897 DOTTERY, LARRY II C/O MARC MENDELSON, ESQ. RITA KOSTOPOULOS, ESQ. 19080 WEST TEN MILE ROAD SOUTHFIELD, MI 48075	00005238	02-12152	05/27/2004	\$150,000.00	U	The proof of claim was filed after the Bar Date.
5312069 MCCOY, GERINA 3160 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004910	02-12167	05/26/2003	\$70,000.00	U	The proof of claim was filed after the Bar Date.

PAGE 1 OF 2

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**Late Filed Claims to be Disallowed and Expunged**  
**Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

BRAAC Group, Inc. v. BSA Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Basis for Objection
6160725 MILJANI BACK CARE CENTER, INC. TED CHUN, D.C., CHIROPRACTOR 95-720 LANIKUHANA AVE. MILJANI, HI 96789	00005312	02-12152	06/21/2004	\$305.71	U	The proof of claim was filed after the Bar Date.
5963928 MOORE, MICHELLE & KEITH C/O WILLIAM W. PRICE, P.A., ATTORNEY A NEIL P. ANTHONY 320 FERN STREET WEST PALM BEACH, FL 33401	00005206	02-12152	03/11/2004	\$1,000,000.00	U	The proof of claim was filed after the Bar Date.
<b>TOTALS:</b>	<b>5</b>			<b>\$1,236,305.71</b>		

- END OF LATE EXHIBIT -

PAGE 2 OF 2

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\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**No Documentation Claims to be Disallowed and Expunged  
Exhibit B - Eighteenth Omnibus (Non-Substantive) Objection**

BRAC Group, Inc. 5100 Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Reason for Proposed Disallowance
5772546 BELGRAVE, MICHAEL 311 TAFT AVE. CLEVELAND, TX 77327	00005283	02-12152	06/10/2004	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
5312089 MACCOY, GERNA 3160 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004910	02-12167	05/28/2003	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
<b>TOTALS:</b>	<b>2</b>			<b>\$140,000.00</b>		

- END OF NODOC EXHIBIT -

PAGE 1 OF 1

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

FOR THE DEBTORS OF BUDGET GROUP, INC.		
In re:		: Chapter 11
BRAC GROUP, INC.		: Case No 02-12152 (CGC)
(f/k/a BUDGET GROUP, Inc.) (02-12152),		: Jointly Administered
Auto Rental Systems, Inc (02-12153),	BRAT TRS, Inc (f/k/a Ryder TRS, Inc.) (02-12185),	:
BGI Airport Parking, Inc (02-12154),	BVM, Inc (02-12170),	:
BGI Shared Services, Inc (02-12155),	Carson Chrysler Plymouth Dodge Jeep	:
BGI Shared Services, LLC (02-12156),	Eagle, Inc (02-12171),	:
BRAC Credit Corporation (02-12157),	Control Risk Corporation (02-12172),	:
BRAC Car Sales, Inc (f/k/a Budget Car Sales, Inc.) (02-12158),	Dayton Auto Lease Company, Inc (02-12173),	:
BRAC Fleet Finance Corporation (f/k/a Budget Fleet Finance	Directors Row Management Company, LLC (02-12174),	:
Corporation) (02-12159),	IN Motors VI, LLC (02-12175),	:
BRAC Rent A Car Asia-Pacific, Inc. (f/k/a Budget Rent A Car	Mastering the Move Realty, Inc (02-12176),	:
Asia-Pacific, Inc.) (02-12160),	Mosiant Car Sales, Inc (02-12177),	:
BRAC Rent a Car Caribe Corporation (f/k/a Budget Rent A Car	NYRAC Inc (02-12178),	:
Caribe Corporation) (02-12161),	Paul West Ford, Inc (02-12179),	:
BRAC Rent A Car Corporation (f/k/a Budget Rent A Car	Phillips Jacobs Insurance Agency, Inc (02-12180),	:
Corporation) (02-12162),	Premier Car Rental LLC (02-12181),	:
BRAC Rent-A-Car International, Inc. (f/k/a Budget Rent-A-Car	Reservation Services, Inc (02-12182),	:
International, Inc.) (02-12163),	TCS Properties, LLC (02-12186),	:
BRAC Rent A Car of Japan, Inc (f/k/a Budget Rent A Car of	Team Car Sales of Charlotte, Inc (02-12187),	:
Japan, Inc.) (02-12164),	Team Car Sales of Dayton, Inc (02-12188),	:
BRAC Rent A Car of St. Louis, Inc (f/k/a Budget Rent A Car of	Team Car Sales of Philadelphia, Inc (02-12189),	:
St. Louis, Inc.) (02-12165),	Team Car Sales of Richmond, Inc (02-12190),	:
BRAC Rent-A-Car of the Midwest, Inc (f/k/a Budget Rent-A-	Team Car Sales of San Diego, Inc (02-12191),	:
Car of the Midwest, Inc.) (02-12166),	Team Car Sales of Southern California, Inc (02-12192),	:
BRAC Rent-A-Car Systems, Inc (f/k/a Budget Rent-A-Car	Team Fleet Services Corporation (02-12193),	:
Systems, Inc.) (02-12167),	Team Holdings Corp (02-12194),	:
BRAC Sales Corporation (f/k/a Budget Sales Corporation) (02-	Team Realty Services, Inc (02-12195),	:
12168),	The Move Shop, Inc (02-12196),	:
BRAC Storage Corporation (f/k/a Budget Storage Corporation)	Transportation And Storage Associates (02-12197),	:
(02-12169),	ValCar Rental Car Sales, Inc (02-12198),	:
BRAT Move Management, Inc (f/k/a Ryder Move	Vehicle Rental Access Company, LLC (02-12199), and	:
Management, Inc.) (02-12183),	Warren Wooten Ford, Inc (02-12200),	:
BRAT Relocation Services, Inc (f/k/a Ryder Relocation		:
Services, Inc.) (02-12184),		:
	Debtors	:

Honorable Charles G. Case, II, was entered and duly docketed by the Office of the Clerk of the United States Bankruptcy Court for the District Court for the District of Delaware (the "Bankruptcy Court") in the above captioned cases of BRAC Group, Inc (f/k/a Budget Group, Inc ) and its affiliated Debtor subsidiaries (collectively, the "Debtors"). The Confirmation Order is on file with the Clerk of the Bankruptcy Court and may be inspected during normal business hours at the Office of the Clerk of the Bankruptcy Court, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801. Copies of the Confirmation Order can also be found at Docket No. 4068 and obtained from the Bankruptcy Court's website at [www.deb.courts.gov](http://www.deb.courts.gov) or by contacting the undersigned counsel to the Debtors. Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Plan.

### **BAR DATE FOR ADMINISTRATIVE CLAIMS**

PLEASE TAKE FURTHER NOTICE that requests for payment of Administrative Claims, including Claims of governmental units for taxes (including tax audit Claims related to tax years commencing after July 29, 2002 (the "Petition Date"), but excluding Claims relating to tax periods or portions thereof, ending on or before the Petition Date), against any of the Debtors other than BRACII (such Debtors, collectively, the "U.S. Debtor Group"), except for Professional Fee Claims (discussed below) not paid prior to the Confirmation Date must file requests for payment of Administrative Claims with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 and served on (i) counsel to the Debtors, (a) Sidley Austin Brown & Wood LLP, Bank One Plaza, 10 South Dearborn Street, Chicago, Illinois 60603, Attn: Larry J. Nyhan and (b) Young Conaway Stargatt & Taylor, LLP, The Brandywine Building, 1000 West Street, 17<sup>th</sup> Floor, P O Box 391, Wilmington, Delaware 19899-0391, Attn: Robert S. Brady; (ii) counsel to Reorganized BGI, Brown Rudnick Berlack Israels LLP, One Financial Center, Boston Massachusetts 02111, Attn: Peter J. Antoszyk; and (iii) the Plan Administrator, Walker, Truesdell & Associates, Inc., 380 Lexington Avenue, Suite 1514, New York, New York 10168, Attn: Hobart Truesdell so as to be received on or before 4:00 p.m. EST on June 7, 2004. ANY ENTITY THAT IS REQUIRED TO FILE AND SERVE SUCH A REQUEST FOR PAYMENT AND FAILS TO TIMELY FILE AND SERVE SUCH REQUEST, SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH CLAIM OR PARTICIPATING IN DISTRIBUTIONS UNDER THE PLAN ON ACCOUNT THEREOF.

### **BAR DATE FOR REJECTION DAMAGE CLAIMS**

PLEASE TAKE FURTHER NOTICE that pursuant to the Plan and the Confirmation Order, each executory contract and unexpired lease entered into by any of the Debtors prior to July 29, 2002 (the "Petition Date") shall be rejected pursuant to section 365 of the Bankruptcy Code, except for any executory contract or unexpired lease that (i) previously has been assumed or rejected by order of the Bankruptcy Court or (ii) is listed on the schedule of assumed contracts annexed as Exhibit C to the Plan Supplement as amended from time to time. Any Claim for damages arising from the rejection of any such executory contract or unexpired lease must be filed with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 and served on (i) counsel to Reorganized BGI, Brown Rudnick Berlack Israels LLP, One Financial Center, Boston, Massachusetts 02111, Attn: Peter J. Antoszyk and (ii) counsel to Reorganized BRACII, Richards, Layton & Finger, P.A., One Rodney Square, P O Box 551, Wilmington, Delaware 19899, Attn: Mark D. Collins, so as to be received no later than thirty (30) days after service of this Notice. ANY ENTITY THAT IS REQUIRED TO FILE AND SERVE SUCH A REQUEST FOR

PAYMENT AND FAILS TO TIMELY FILE AND SERVE SUCH REQUEST, SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH CLAIM OR PARTICIPATING IN DISTRIBUTIONS UNDER THE PLAN ON ACCOUNT THEREOF

**BAR DATE FOR PROFESSIONAL FEE CLAIMS**

PLEASE TAKE FURTHER NOTICE that all Professionals or other persons requesting compensation or reimbursement pursuant to sections 327, 328, 330, 331, 503(b) and 1103 of the Bankruptcy Code for services rendered to the Debtors prior to the Effective Date (including requests under section 503(b)(4) of the Bankruptcy Code by any Professional or other entity for making a substantial contribution in these Chapter 11 Cases) shall file an application for final allowance of such compensation and reimbursement with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 and served on (i) counsel to Reorganized BGI, Brown Rudnick Berlack Israels LLP, One Financial Center, Boston, Massachusetts 02111, Attn: Peter J. Antoszyk (ii) counsel to Reorganized BRACII, Richards, Layton & Finger, P.A., One Rodney Square, P.O. Box 551, Wilmington, Delaware 19899, Attn: Mark D. Collins, and (iii) the Office of the United States Trustee, 844 King St., Suite 2207, Wilmington, DE 19801, Attn: Margaret Harrison, **so as to be received no later than 60 days after the Effective Date**. The Debtors currently anticipate that the Effective Date will be May 3, 2004. ANY ENTITY THAT IS REQUIRED TO FILE AND SERVE SUCH A REQUEST FOR PAYMENT AND FAILS TO TIMELY FILE AND SERVE SUCH REQUEST, SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING SUCH CLAIM OR PARTICIPATING IN DISTRIBUTIONS UNDER THE PLAN ON ACCOUNT THEREOF.

PLEASE TAKE FURTHER NOTICE that service of this Notice of Confirmation constitutes good and sufficient notice pursuant to Bankruptcy Rules 2002 and 3020 of entry of the Confirmation Order confirming the Plan and of the other relief granted in the Confirmation Order, and no other or further notice need be given.

**PLEASE TAKE FURTHER NOTICE THAT THE PLAN AND CONFIRMATION ORDER CONTAIN PROVISIONS THAT MAY AFFECT YOUR RIGHTS. YOU ARE ENCOURAGED TO REVIEW THE PLAN AND CONFIRMATION ORDER IN THEIR ENTIRETY.**

Dated: April 30, 2004

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

/s/ Matthew B. Lunn

Robert S. Brady (No. 2847)  
Edmon L. Morton (No. 3856)  
Joseph A. Malfitano (No. 4020)  
Matthew B. Lunn (No. 4119)  
The Brandywine Building  
1000 West Street, 17th Floor  
P O Box 391  
Wilmington, Delaware 19899-0391  
Tel: (302) 571-6600  
Facsimile: (302) 571-1253

&

SIDLEY AUSTIN BROWN & WOOD LLP

Larry J. Nyhan  
James F. Conlan  
Matthew A. Clemente  
Dennis M. Twomey  
Bank One Plaza  
10 South Dearborn Street  
Chicago, IL 60603  
Tel: (312) 853-7000  
Facsimile: (312) 853-7036

Attorneys for Debtors and Debtors in Possession

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (JLP)

Related Docket Nos. 5264 and 5315

**CERTIFICATION OF COUNSEL REGARDING THE  
EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS  
PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

I, Gregory A. Taylor, hereby certify the following:

1. I am an attorney with Ashby & Geddes, P.A., Delaware Counsel to Walker, Truesdell & Associates, in its capacity as Plan Administrator (the "Plan Administrator"), with respect to the above-captioned case.

2. On November 4, 2004, the Plan Administrator filed and served the Eighteenth Omnibus Objection (Non-Substantive) to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 [Docket No. 5264] (the "Eighteenth Omnibus Objection"). Schedules of the claims subject to objection via the Eighteenth Omnibus Objection were attached to the Eighteenth Omnibus Objection as Exhibits A and B (the "Eighteenth Omnibus Objection Exhibits").

3. On December 7, 2004, the Court convened a hearing and subsequently entered an Order approving the Eighteenth Omnibus Objection [Docket No. 5315] (the "Eighteenth

<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.'s United States debtor subsidiaries.

**A10**

DKT. NO. 5325

DT. FILED 12-10-04

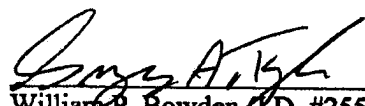
Omnibus Order"). Following entry of the Eighteenth Omnibus Order, the Plan Administrator discovered that the Eighteenth Omnibus Order incorrectly references the Exhibits attached thereto.

4. Specifically, the Eighteenth Omnibus Objection Proposed Order refers to the claims identified on Exhibit A attached to the Order as "No Documentation Claims to be Disallowed and Expunged," when in fact such claims are identified on Exhibit A as "Late Filed Claims to be Disallowed and Expunged," and, conversely, the Order refers to the claims identified on Exhibit B attached to the Order as "Late Filed Claims to be Disallowed and Expunged," when in fact such claims are identified on Exhibit B as "No Documentation Claims to be Disallowed and Expunged."

5. Thus, in order to correct the record, the undersigned counsel to the Plan Administrator hereby submits the form of Amended Order approving the Eighteenth Omnibus Objection attached hereto as Exhibit 1, which correctly references the claims identified on the Eighteenth Omnibus Objection Exhibits. Accordingly, the undersigned respectfully requests entry of the Amended Order attached hereto as Exhibit 1 at the Court's earliest convenience.

Dated: December 10, 2004

ASHBY & GEDDES, P.A.

  
William P. Bowden (I.D. #2553)  
Gregory A. Taylor (I.D. #4008)  
222 Delaware Avenue, 17<sup>th</sup> Floor  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888

*-and-*

BROWN RUDNICK BERLACK  
ISRAELS LLP  
Peter J. Antoszyk, Esq.  
Daniel J. Saval, Esq.  
One Financial Center  
Boston, MA 02111  
(617) 856-8200

Counsel to the Plan Administrator

151054.1

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (JLP)

Related Docket Nos. 5264 and 5315

**AMENDED ORDER APPROVING EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

Upon consideration of the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 (the "Objection");<sup>2</sup> by which the Plan Administrator requested the entry of an order disallowing in full and expunging each of the claims listed on Exhibits A and B attached to the Objection; and after hearing and consideration of the Objection and arguments contained therein, and the opposition thereto, if any; and the Court finding that (a) the Court has jurisdiction over this matter pursuant to Article XI of the Plan, 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and (c) notice of the Objection was due and proper under the circumstances; and good and sufficient cause appearing therefor, it is hereby

ORDERED, that the Objection is sustained as provided herein; and it is further

ORDERED, that the Late Filed Claims identified as "Late Filed Claims to be Disallowed and Expunged" on Exhibit A attached hereto are disallowed in full and expunged in their

<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.'s United States debtor subsidiaries.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Objection.



entirety; and it is further

ORDERED, that the No Documentation Claims identified as “No Documentation Claims to be Disallowed and Expunged” on Exhibit B attached hereto are disallowed in full and expunged in their entirety; and it is further

ORDERED, that this Court shall retain jurisdiction with respect to any matters related to or arising from the implementation or interpretation of this Order.

Dated: December \_\_\_\_, 2004  
Wilmington, Delaware

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Honorable John L. Peterson  
United States Bankruptcy Judge

#1308690 v.1  
151055.1

**Late Filed Claims to be Disallowed and Expunged  
Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

BRAC Group, Inc. f/k/a Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Basis for Objection
610825 COMANS, JAMES C/O WALTZER & ASSOCIATES BRUCE C. WALTZER 3715 WESTBANK EXP. SUITE 13 HARVEY, LA 70058	00005233	02-12152	05/20/2004	\$10,000.00	U	The proof of claim was filed after the Bar Date.
6112897 DOTTERY, LARRY II C/O MARC MENDELSON, ESQ. RITA KOSTOPOULOS, ESQ. 19080 WEST TEN MILE ROAD SOUTHFIELD, MI 48075	00005238	02-12152	05/27/2004	\$150,000.00	U	The proof of claim was filed after the Bar Date.
5312089 MCCOY, GERINA 3160 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004910	02-12167	05/28/2003	\$70,000.00	U	The proof of claim was filed after the Bar Date.

PAGE 1 OF 2

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\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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BRAC Group, Inc. f/k/a Budget Group, Inc., et al.  
Case No. 02-12152

**Late Filed Claims to be Disallowed and Expunged  
Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Basis for Objection
6160725 MILILANI BACK CARE CENTER, INC. TED CHUN, D.C., CHIROPRACTOR 95-720 LANIKUHANA AVE. MILILANI, HI 96789	00005312	02-12152	06/21/2004	\$305.71	U	The proof of claim was filed after the Bar Date.
5983928 MOORE, MICHELLE & KEITH C/O WILLIAM W. PRICE, P.A., ATTORNEY A NEIL P. ANTHONY 320 FERN STREET WEST PALM BEACH, FL 33401	00005209	02-12152	03/11/2004	\$1,000,000.00	U	The proof of claim was filed after the Bar Date.
<b>TOTALS:</b>	<b>5</b>			<b>\$1,230,305.71</b>		

- END OF LATE EXHIBIT -

PAGE 2 OF 2

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

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BRAC Group, Inc. *filed* Budget Group, Inc., et al.  
Case No. 02-12152

**No Documentation Claims to be Disallowed and Expunged  
Exhibit B - Eighteenth Omnibus (Non-Substantive) Objection**

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Reason for Proposed Disallowance
5772546 BELGRAVE, MICHAEL 311 TAFT AVE. CLEVELAND, TX 77327	00005293	02-12152	06/10/2004	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
5312089 MCCOY, GERINA 3160 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004910	02-12167	05/28/2003	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
<b>TOTALS:</b>	<b>2</b>			<b>\$140,000.00</b>		

- END OF NODOC EXHIBIT -

PAGE 1 OF 1

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

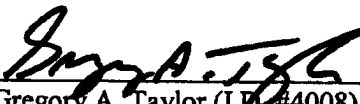
The Trustee/Attorney Group 4 Griffin Road North, Windsor, CT 06095

660-667-7550

version\_01

**CERTIFICATE OF SERVICE**

I, Gregory A. Taylor, hereby certify that, on the 10<sup>th</sup> day of December 2004, I caused a true and correct copy of the *Certification of Counsel Regarding the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1* be served upon the attached service list by U.S. Mail, postage pre-paid, or in the manner so indicated:

  
\_\_\_\_\_  
Gregory A. Taylor (I.D. #4008)

120926v2

In re BRAC Group, Inc.; Case No. 02-12152 (CGC)  
Post-Effective Date Rule 2002 Service List for 18<sup>th</sup> Omn. Cl. Obj.  
149640.1

**HAND DELIVERY**

Robert S. Brady, Esq.  
Joseph A Malfitano, Esq.  
Young, Conaway, Stargatt & Taylor, LLP  
1000 West Street, 17<sup>th</sup> Floor  
Wilmington, DE 19899  
*Counsel to the Debtors*

Lawrence J. Nyhan, Esq  
Sidley Austin Brown & Wood LLP  
Bank One Plaza  
10 South Dearborn Street  
Chicago IL 60603  
*Debtor in Possession*

Shmuel Vasser, Esq.  
Skadden Arps Slate Meagher & Flom LLP  
Four Times Square  
New York, New York 10036  
*Budget Rent A Car System*

Budget Group, Inc.  
Attn: David Coonfield  
125 Basin Street, Suite 210  
Daytona Beach, FL 32114  
*Debtor*

Edward H. Arnold, III, Esq.  
Seth A. Levine, Esq.  
Baker Donelson Bearman Caldwell & Berkowitz PC  
201 St. Charles Avenue, Suite 3600  
New Orleans, LA 70170  
*New Orleans International Airport*

John A. Anthony, Esq.  
GRAYROBINSON, P.A.  
P.O. Box 3324  
Tampa, Florida 33601  
*Eckerd Corporation*

**HAND DELIVERY**

Christopher P. Simon  
Cross & Simon, LLC  
913 Market Street, Suite 1001  
Wilmington DE 19801

**HAND DELIVERY**

Margaret Harrison, Esq.  
Office of the United States Trustee  
844 King Street, Room 2313  
Wilmington, DE 19801  
*Trustee*

Budget Group, Inc.  
Attn: Bill Johnson, CFO  
4225 Naperville Road  
Lisle, IL 60532  
*Debtor*

**HAND DELIVERY**

Mark D. Collins  
Richard Layton & Finger  
One Rodney Square  
Wilmington, DE 19801  
*UK Plan Administrator*

**HAND DELIVERY**

Anthony W. Clark, Esq.  
Skadden Arps Slate Meagher & Flom LLP  
One Rodney Square  
Wilmington, DE 19899  
*Budget Rent A Car System*

James Comans  
C/o Waltzer & Associates  
Bruce C. Waltzer  
3715 Westbank Exp.; Ste. 13  
Harvey, LA 70058

**HAND DELIVERY**

Robert J. Dehney, Esq.  
Daniel B. Butz, Esq.  
Morris Nichols Arsh & Tunnell  
1201 Market Street, Suite 1501  
P.O. Box 1347  
Wilmington, Delaware 19899-1347

Chester B. Salomon, Esq.  
Constantine D. Pourakis, Esq.  
Salomon, Green & Ostrow, PC  
485 Madison Avenue, 20<sup>th</sup> Floor  
New York, NY 10022

In re BRAC Group, Inc.; Case No. 02-12152 (CGC)  
Post-Effective Date Rule 2002 Service List for 18<sup>th</sup> Omn. Cl. Obj.  
149640.1

Larry Dottery, II  
c/o Marc Mendelson, Esq.  
Rita Kostopoulos, Esq.  
19080 West Ten Mile Road  
Southfield, MI 48075

Carroll Dunaway  
c/o Herald Moore & Willett PLLC  
1901 Central Drive; Ste. 610  
Bedford, TX 76021

Grace Dunaway  
28700 Waikiki Ln.  
Montgomery, TX 77356

Demetria Lincoln  
4410 Fanconia Dr.  
Apt. A  
Montgomery, AL 36116

Mililani Back Care Center, Inc.  
Ted Chun, D.C., Chiropractor  
95-720 Lanikuhana Ave.  
Mililani, HI 96789

Michelle & Keith Moore  
c/o William W. Price, PA  
Neil P. Anthony  
320 Fern St.  
West Palm Beach, FL 33401

Victor Anyakwo  
c/o Michael Smith  
21515 Hawthorne Blvd.; Ste. 590  
Torrance, CA 90503

Michael Belgrave  
311 Taft Ave.  
Cleveland, TX 77327

Michelle Cox  
c/o Michael Smith  
21515 Hawthorne Blvd.; Ste. 590  
Torrance, CA 90503

Gerina McCoy  
3160 Virginia Downs  
Apt. A  
Montgomery, AL 36116

**Miscellaneous:**

02-12152-JLP BRAC Group, Inc., et al (f/k/a Budget Group, Inc)

**U.S. Bankruptcy Court**

**District of Delaware**

**Notice of Electronic Filing**

The following transaction was received from Taylor, Gregory Alan entered on 12/10/2004 at 10:37 AM EST and filed on 12/10/2004

**Case Name:** BRAC Group, Inc., et al (f/k/a Budget Group, Inc)

**Case Number:** 02-12152-JLP

**Document Number:** 5325

**Docket Text:**

*Certification of Counsel Regarding Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1* (related document(s)[5264], [5315] ) Filed by Plan Administrator (Taylor, Gregory)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**C:\Documents and Settings\JSchier%\Desktop\coc.pdf

**Electronic document Stamp:**

[STAMP bkecfStamp\_ID=983460418 [Date=12/10/2004] [FileNumber=3246951-0]  
][839edc20061dff679fe929f335e163924444f92e84ccf1f16958ed4a0561832bef7  
b5d8b600e83eab54e8f27b1107ff69d2365fa3362d3ceb7e016cf0e4cf4e5]]

**02-12152-JLP Notice will be electronically mailed to:**

David G. Aelvoet   davida@publicans.com,

Athanasios E. Agelakopoulos   bankruptcy@ycst.com,

Elihu Ezekiel Allinson III   bankruptcy@pacdelaware.com

Curtis S. Alva   jschlosberg@shutts-law.com

Elizabeth Banda   arlbank@pbfc.com, hrodriguez@pbfc.com;bmedley@pbfc.com

William Wright Banks   wright.banks@law.state.ga.us,

Austin Kelser Barron   abarron@omm.com, cmorris@omm.com

Sean Matthew Beach   bankruptcy@ycst.com

Richard D. Becker   rick.becker@delanet.com

**A21**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (JLP)

Related Docket Nos. 5264 and 5315

**AMENDED ORDER APPROVING EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

Upon consideration of the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 (the "Objection");<sup>2</sup> by which the Plan Administrator requested the entry of an order disallowing in full and expunging each of the claims listed on Exhibits A and B attached to the Objection; and after hearing and consideration of the Objection and arguments contained therein, and the opposition thereto, if any; and the Court finding that (a) the Court has jurisdiction over this matter pursuant to Article XI of the Plan, 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and (c) notice of the Objection was due and proper under the circumstances; and good and sufficient cause appearing therefor, it is hereby

ORDERED, that the Objection is sustained as provided herein; and it is further

ORDERED, that the Late Filed Claims identified as "Late Filed Claims to be Disallowed and Expunged" on Exhibit A attached hereto are disallowed in full and expunged in their

<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.'s United States debtor subsidiaries.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Objection.

entirety; and it is further

ORDERED, that the No Documentation Claims identified as "No Documentation Claims to be Disallowed and Expunged" on Exhibit B attached hereto are disallowed in full and expunged in their entirety; and it is further

ORDERED, that this Court shall retain jurisdiction with respect to any matters related to or arising from the implementation or interpretation of this Order.

Dated: December 15, 2004  
Wilmington, Delaware

  
Honorable John L. Peterson  
United States Bankruptcy Judge

#1308690 v.1  
151055.1

**Late Filed Claims to be Disallowed and Expunged**  
**Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

SPAC Group, Inc. d/b/a Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claims Number	Case Number	Date Claim Filed	Total Claim Amount*	Claims Priority Status	Reason for Objection
8108825 COMANS, JAMES C/O WALTZER & ASSOCIATES BRUCE C. WALTZER 3715 WESTBANK EXP. SUITE 13 HARVEY, LA 70068	00005233	02-12152	05/20/2004	\$10,000.00	U	The proof of claim was filed after the Bar Date.
8112897 DOTTREY, LARRY II C/O MARC MENDELSON, ESQ. RITA KOSTOPOULOS, ESQ. 19080 WEST TEN MILE ROAD SOUTHFIELD, MI 48075	00005238	02-12152	05/27/2004	\$150,000.00	U	The proof of claim was filed after the Bar Date.
5312088 MACDOY, GERINA 3180 VIRGINIA DOWNS APT. A MONTGOMERY, AL 38116	00004910	02-12157	05/28/2003	\$70,000.00	U	The proof of claim was filed after the Bar Date.

PAGE 1 OF 2

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

The Trustall Group, 4 Griffin Road North, Windsor, CT 06095 860-857-7596

version\_01

**Late Filed Claims to be Disallowed and Expunged  
Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

BRAC Group, Inc. d/b/a Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claims Priority Status	Basis for Objection
6160725 MILLIAM BACK CARE CENTER, INC. TED CHUN, D.C., CHIROPRACTOR 96-720 LANIKUHANA AVE. MILILANI, HI 96769	00005312	02-12152	08/21/2004	\$305.71	U	The proof of claim was filed after the Bar Date.
5963928 MOORE, MICHELLE & KEITH C/O WILLIAM W. PRICE, P.A., ATTORNEY A NEIL P. ANTHONY 320 FERN STREET WEST PALM BEACH, FL 33401	00005209	02-12152	03/11/2004	\$1,000,000.00	U	The proof of claim was filed after the Bar Date.
<b>TOTALS:</b>	<b>5</b>			<b>\$1,230,305.71</b>		

- END OF LATE EXHIBIT -

PAGE 2 OF 2

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

The Trembali Group, 4 Griffin Road North, Windsor, CT 06095 860-637-7598

version\_01

**No Documentation Claims to be Disallowed and Expunged  
Exhibit B - Eighteenth Omnibus (Non-Substantive) Objection**

BBAC Group, Inc. 6116 Budget Group, Inc., et al.  
Case No. 02-12152

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Reason for Proposed Disallowance
5772546 BELGRAVE, MICHAEL 311 TAFT AVE. CLEVELAND, TX 77327	00005293	02-12152	06/10/2004	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
5312089 MCDOY, GERINA 3180 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004910	02-12167	05/28/2003	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
<b>TOTALS:</b>	<b>2</b>			<b>\$140,000.00</b>		

- END OF NODOC EXHIBIT -

PAGE 1 OF 1

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

The Trumbull Group 4 Griffin Road North, Windsor, CT 06095 860-687-7598

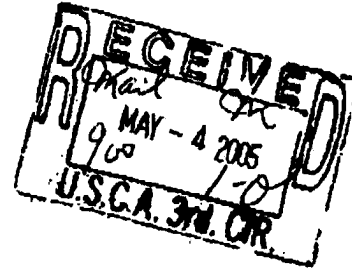
version\_01

IN THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

In re:  
BRAC GROUP, INC. (f/k/a Budget Group, Inc.),  
Reorganized Debtor.

Chapter 11  
Case No. 02-12152 (JLP)

v.  
MICHAEL BELGRAVE (f/k/a Came' International Travel & Tours, Inc.)  
Claimant



**LOCAL APPELLATE RULE 3.4 NOTICE OF APPEAL IN PRO SE CASES**  
**OBJECTION TO ORDER and AMENDED ORDER APPROVING EIGHTEENTH OMNIBUS (NON-**  
**SUBSTANTIVE) OBJECTION TO CLAIMS PURSUANT TO SECTION 502(h) OF THE**  
**BANKRUPTCY CODE, BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

Upon consideration of the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(h) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 (the "Objection") by which the Plan Administrator (William P. Bowden I.D.#2553 and Gregory A. Taylor I.D.#4008) requested the entry of an order disallowing in full and expunging each of the claims listed on Exhibit A (identified as "No Documentation Claims to be Disallowed and Expunged") and Exhibit B (identified as "Late Filed Claims to be Disallowed and Expunged") were attached to the order (Docket Number 5315 filed 12/6/04).

I, Michael Belgrave (the "Claimant"), hereby attest the following:

1. I am a claimant in the BRAC GROUP, INC. (f/k/a Budget Group, Inc.) bankruptcy proceeding, where Ashby & Geddes, P.A., Delaware Counsel to Walker, Trocendell & Associates, in its capacity as Plan Administrator (the "Plan Administrator"), with respect to the above captioned case.
2. On November 17, 2004, the Claimant filed and served the response (Docket Number 5283) along with evidence of documentation listed on Docket Number 5292 11/24/04 and amended Docket Number 5304 12/3/04.
3. The Plan Administrator filed Docket Number 5315 12/6/04 (Approval of Eighteenth Omnibus Objection) which predates hearing yet is endorsed by Honorable John L. Peterson, Bankruptcy Judge and is referenced as 12/7/04 on item 3 of Docket Number 5325 (Amended Order) which no endorsement appears.
4. Specifically, the signed order being invalid, corrupts the Eighteenth Omnibus Objection and should be excluded from the plan. The amended order was filed (3) days after the court hearing which negates the purpose of the Eighteenth Omnibus Objection and should be hereby excluded from the plan.
5. Thus, in order to correct the record, I pray the court dismiss in full the Eighteenth Omnibus Objection, whereas the undersigned counsel to the Plan Administrator should honor my claim at the Court's earliest convenience, pursuant to local appellate rules 3.4 and 11.2, please find copies of all filed dockets.

Dated April 25, 2005

  
MICHAEL BELGRAVE

OFFICE OF THE CLERK

MARCIA M. WALDRON  
CLERK

**UNITED STATES COURT OF APPEALS**  
FOR THE THIRD CIRCUIT  
21400 UNITED STATES COURTHOUSE  
601 MARKET STREET  
PHILADELPHIA 19106-1790

TELEPHONE  
215-597-2995

May 4, 2005

Michael Belgrave  
311 Taft  
Cleveland, TX 77327

Re: Undocketed in Third Circuit Court of Appeals  
(D. Del. Bankr. No. 02-12152 (J.B))

FILED  
MAY - 6 AM 11:44  
CLERK  
U.S. COURT OF APPEALS  
THIRD CIRCUIT  
PHILADELPHIA

Dear Mr. Belgrave:

The enclosed notice of appeal is forwarded to the Clerk of the United States District Court for the District of Delaware for such action, if any, that Court deems appropriate. It does not appear that this Court has authority to take any action in regard to it. The notice was received in this Court on May 4, 2005.

Under the version of 28 U.S.C. § 158(d) currently in effect, a court of appeals has no authority to consider an appeal from a bankruptcy court. Such an appeal must be directed in the first instance to the district court. 28 U.S.C. § 158(a). Since no district court number is identified in your notice of appeal, we must conclude that you have not yet completed the appeal process in the district court. Therefore this Court has no authority to consider the matter unless an appeal is filed from a decision rendered by the district court in the initial appeal.

In any event, even if you have completed the appeal process in the district court, a notice of appeal seeking to initiate an appeal in this Court must be filed with the clerk of the district court as required by Rules 3 and 4, Federal Rules of Appellate Procedure. This Court may not take any action in regard to a notice of appeal until the notice has been entered on the District Court docket and has been certified to this Court by the clerk of the district court.

Very truly yours,

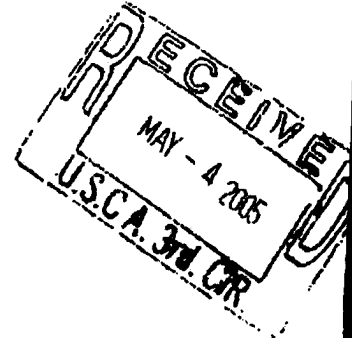
Marcia M. Waldron, Clerk

By:

/s/ Bradford A. Baldus  
Bradford A. Baldus  
Senior Legal Advisor to the Clerk

cc: Peter T. Dalleo, Clerk (with enclosure)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE



In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (JLP)

Related Docket Nos. 5264 and 5315

**AMENDED ORDER APPROVING EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE)  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY  
CODE, BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

Upon consideration of the Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 (the "Objection");<sup>2</sup> by which the Plan Administrator requested the entry of an order disallowing in full and expunging each of the claims listed on Exhibits A and B attached to the Objection; and after hearing and consideration of the Objection and arguments contained therein, and the opposition thereto, if any; and the Court finding that (a) the Court has jurisdiction over this matter pursuant to Article XI of the Plan, 28 U.S.C. §§ 157 and 1334, (b) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and (c) notice of the Objection was due and proper under the circumstances; and good and sufficient cause appearing therefor, it is hereby

ORDERED, that the Objection is sustained as provided herein; and it is further

ORDERED, that the Late Filed Claims identified as "Late Filed Claims to be Disallowed and Expunged" on Exhibit A attached hereto are disallowed in full and expunged in their

<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.'s United States debtor subsidiaries.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Objection.

DKT. NO. 5330

DI. FILED 12-16-04

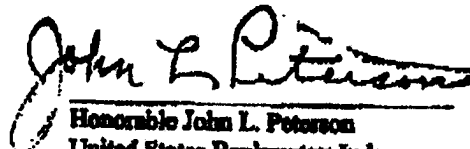


entirety, and it is further

ORDERED, that the No Documentation Claims identified as "No Documentation Claims to be Disallowed and Expunged" on Exhibit B attached hereto are disallowed in full and expunged in their entirety, and it is further

ORDERED, that this Court shall retain jurisdiction with respect to any matters related to or arising from the implementation or interpretation of this Order.

Dated: December 15, 2004  
Wilmington, Delaware

  
Honorable John L. Peterson  
United States Bankruptcy Judge

#120489 vJ  
151033.1

SMC Group, Inc. 1000 Budget Center, Inc. 21 St. St.  
Suite 100, 02122

**Late Filed Claims to be Disallowed and Expunged  
Exhibit A - Eighteenth Omnibus (Non-Substantive) Objection**

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Reason for Objection
610827 COMANS, JAMES C/O WALTER & ASSOCIATES BRUCE G. WELTZER 2718 WESTBANK EXP. SUITE 13 HARVEY, LA 70006	0000023	02-12762	04/20/2004	\$15,000.00	U	The proof of claim was filed after the Bar Date.
611287 GOTTHER, LARRY B C/O HMC MEDICAL, INC. PITA HOSPITAL, INC. 1008 WEST TEN MILE ROAD SOUTHFIELD, MI 48076	0000036	02-12762	06/27/2004	\$180,000.00	U	The proof of claim was filed after the Bar Date.
511288 MOODY, GERRA 3116 VIRGINIA BOYD APT. A MONTGOMERY, AL 36116	0000410	02-12167	05/28/2003	\$78,000.00	U	The proof of claim was filed after the Bar Date.

PAGE 1 OF 2

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional considerations, unpaid interest, interest, penalties and/or fees.

The Trustee Group, 4 Griffin Road North, Westport, CT 06896

version\_01

BJAC Group, Inc. 8100 Bridgeway, Suite 200  
 San Francisco, CA 94134

**Late Filed Claims to be Disallowed and Expunged  
 Exhibit A - Eighteen (18) Objections**

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Reason for Objection
0140728 MELAN BACK CARE CENTER, INC. TED CHAN, D.O., CHIROPRACTOR 16-728 LANSING AVE. MELAN, MI 48769	00000012	02-12102	02/21/2004	\$208.71	U	The proof of claim was filed after the Bar Date.
0140805 MOORE, MICHELLE A. REITH C/O WILLIAM W. FROEL, P.A., ATTORNEY A NIEL P. ANTHONY 320 PINE STREET WEST PALM BEACH, FL 33401	00000008	02-12102	03/11/2004	\$1,000,000.00	U	The proof of claim was filed after the Bar Date.
<b>TOTALS</b>	<b>2</b>			<b>\$1,208,708.71</b>		

- END OF LATE EXHIBIT -

PAGE 2 OF 2

Class Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - Unknown

\* Plus, in certain instances, additional contingent, undistributed amounts, interest, penalties and/or fees.

The Trustee Group, 4 Gullin Road North, Wilton, CT 06895 800-657-7266

version\_01

BRAC Group, Inc. 2010 Budget Group, Inc. 2011  
 Case No. 05-2512

**No Documentation Claims to be Disallowed and Expunged  
 Exhibit B - Eighteenth Circuit (Non-Substantive) Objection**

Creditor Name and Address	Claim Number	Case Number	Date Claim Filed	Total Claim Amount*	Claim Priority Status	Reason for Proposed Disallowance
8772649 BELGRADE, MICHAEL 311 TAFT AVE. CLEVELAND, TX 77327	00000315	02-12152	05/10/2004	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
8715869 MOODY, GENEVA 3188 VIRGINIA DOWNS APT. A MONTGOMERY, AL 36116	00004710	02-12167	05/20/2003	\$70,000.00	U	The claimant has submitted no documentation to support the claim.
<b>TOTAL:</b>	<b>2</b>			<b>\$140,000.00</b>		

- END OF NODOC EXHIBIT -

PAGE 1 OF 1

Claim Key: A - Administrative, P - Priority, S - Secured, U - Unsecured, K - (Unknown)

\* Plus, in certain instances, additional contingencies, anticipated awards, interest, penalties and/or fees.

The Thirteenth Group 4 Credit Fund, LLC, 100000, 07 0000 000-007-7200

version\_01

Subject: FW: CH-11 02-12152-JLP "Order" BRAC Group, Inc.,

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** You may view the filed documents once without charge. To avoid later charges, download a copy of each document during this first viewing.

**U.S. Bankruptcy Court**

**District of Delaware**

**Notice of Electronic Filing**

The following transaction was received from LCN, entered on 12/16/2004 at 2:09 PM EST and filed on 12/16/2004

Case Name: BRAC Group, Inc., et al (f/k/a Budget Group, Inc)

Case Number: 02-12152-JLP

Document Number: 5332

**Docket Text:**

Order (AMENDED) Approving Eighteenth Omnibus (Non-Substantive) Objection to Claims. (related document(s)[5264], [5315] ) Order Signed on 12/15/2004. (LCN, )

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: T:\LCN\Scanning\12.pdf

Electronic document Stamp:

[STAMP bkecfStamp\_ID=983460418 [Date=12/16/2004] [FileNumber=3277193-0]  
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**02-12152-JLP Notice will be electronically mailed to:**

David G. Aelvoet [davida@publicans.com](mailto:davida@publicans.com),

Athanasios E. Agelakopoulos [bankruptcy@ycst.com](mailto:bankruptcy@ycst.com),

Elihu Ezekiel Allinson III [bankruptcy@pacdelaware.com](mailto:bankruptcy@pacdelaware.com)

Curtis S. Alva [jschlosberg@shutts-law.com](mailto:jschlosberg@shutts-law.com)

Elizabeth Banda [arlbank@pbfc.com](mailto:arlbank@pbfc.com), [brodriguez@pbfc.com](mailto:brodriguez@pbfc.com); [bmedley@pbfc.com](mailto:bmedley@pbfc.com)

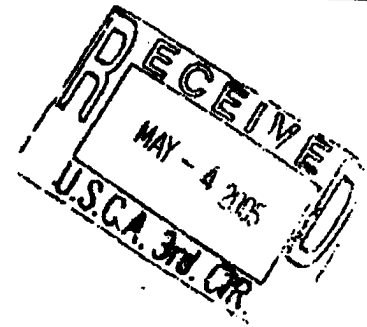
William Wright Banks [wright.banks@law.state.ga.us](mailto:wright.banks@law.state.ga.us),

Austin Kelser Barron [abarron@omm.com](mailto:abarron@omm.com), [cmorris@omm.com](mailto:cmorris@omm.com)

Sean Matthew Beach [bankruptcy@ycst.com](mailto:bankruptcy@ycst.com)

12/17/2004

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE



In re:

BRAC GROUP, INC.  
(f/k/a Budget Group, Inc.),

Reorganized Debtor.<sup>1</sup>

Chapter 11

Case No. 02-12152 (JLP)

Related Docket Nos. 5264 and 5315

**CERTIFICATION OF COUNSEL REGARDING THE  
EIGHTEENTH OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS  
PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULES 3003 AND 3007 AND LOCAL RULE 3007-1**

I, Gregory A. Taylor, hereby certify the following:

1. I am an attorney with Ashby & Goddes, P.A., Delaware Counsel to Walker, Truesdell & Associates, in its capacity as Plan Administrator (the "Plan Administrator"), with respect to the above-captioned case.
2. On November 4, 2004, the Plan Administrator filed and served the Eighteenth Omnibus Objection (Non-Substantive) to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 [Docket No. 5264] (the "Eighteenth Omnibus Objection"). Schedules of the claims subject to objection via the Eighteenth Omnibus Objection were attached to the Eighteenth Omnibus Objection as Exhibits A and B (the "Eighteenth Omnibus Objection Exhibits").
3. On December 7, 2004, the Court convened a hearing and subsequently entered an Order approving the Eighteenth Omnibus Objection [Docket No. 5315] (the "Eighteenth

<sup>1</sup> The Debtors were substantively consolidated on May 3, 2004 pursuant to Section 4.1 of the Second Amended Joint Chapter 11 Liquidating Plan confirmed on April 23, 2004 and made effective on May 3, 2004. On June 21, 2004, this Court entered a final decree closing the Chapter 11 cases of Budget Group, Inc.'s United States debtor subsidiaries.

DKT. NO. 5325

A35

DT. FILED 12-10-04